

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
) Chapter 11
)
VILLAGE ROADSHOW ENTERTAINMENT) Case No. 25-10475 (TMH)
GROUP USA INC., <i>et al.</i> , ¹) (Jointly Administered)
)
Debtors.)
)

**SUPPLEMENTAL DECLARATION OF
CHAD J. HUSNICK IN SUPPORT OF THE DEBTORS'
APPLICATION FOR ENTRY OF AN ORDER PURSUANT TO
SECTION 327(e) OF THE BANKRUPTCY CODE AUTHORIZING THE
RETENTION AND EMPLOYMENT OF KIRKLAND & ELLIS LLP AND
KIRKLAND & ELLIS INTERNATIONAL LLP AS SPECIAL LITIGATION
COUNSEL FOR THE DEBTORS EFFECTIVE AS OF MARCH 17, 2025**

I, Chad J. Husnick, being duly sworn, state the following under penalty of perjury:

1. I am the president of Chad J. Husnick, P.C., a partner of the law firm of Kirkland & Ellis LLP, located at 333 West Wolf Point Plaza, Chicago, IL 60654, and a partner of Kirkland & Ellis International, LLP (together with Kirkland & Ellis LLP, collectively, “Kirkland”). I am a member in good standing of the Bar of the State of Illinois and the Bar of the State of New York, and I have been admitted to practice in the Supreme Court of the United States, the United States Courts of Appeals for the Second Circuit, Fourth Circuit, and Seventh Circuit, and the United States District Courts for the Northern District of Illinois and the Southern District of New York. There are no disciplinary proceedings pending against me.

¹ The last four digits of Village Roadshow Entertainment Group USA Inc.’s federal tax identification number are 0343. The mailing address for Village Roadshow Entertainment Group USA Inc. is 750 N. San Vicente Blvd. Suite 800 West, West Hollywood, CA 90069. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors and the last four digits of their federal tax identification is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/vreg>.

2. On March 17, 2025, (the “Petition Date”), each of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a petition with this Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). On April 10, 2025, the Debtors filed an application to employ and retain Kirkland as counsel for the Debtors [Docket No. 174] (the “Application”) pursuant to sections 327(e) and 330 of the Bankruptcy Code, rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 2014-1 and 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

3. My declaration in support of the Application (the “Original Declaration”) was attached to the Application as Exhibit B. On April 28, 2025, the Court entered the *Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Special Litigation Counsel for the Debtors Effective as of March 17, 2025* [Docket No. 290] (the “Retention Order”).

4. In connection with the Application, I submit this supplemental declaration (this “Supplemental Declaration”) to supplement disclosures set forth in the Original Declaration and to provide additional disclosures in accordance with Bankruptcy Rules 2014(a) and 2016(b). Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

Additional Disclosures

5. As I stated in the Original Declaration, Kirkland has searched its electronic database of representations for connections to parties in interest in these chapter 11 cases. Certain connections were disclosed in the Application. Since the Original Declaration was filed Kirkland has not become aware of any additional parties in interest in these chapter 11 cases.

6. Kirkland re-ran searches in its electronic database for the entities that were previously reviewed in the Application. Those entities that were re-run are listed on Schedule 1.² None of the current and prior representations of the parties identified on Schedule 1 are materially adverse to the interests of the Debtors' estates on matters in which Kirkland is representing the Debtors.

Specific Disclosures

7. As discussed in the Original Declaration, prior to the Petition Date, Kirkland represented Vine Investment Advisors, L.P. ("Vine") and certain of its affiliates. Kirkland represented Vine in connection with certain stock sales related to the Debtors. The last time billed to the representation was in 2022. Kirkland also represented Vine in connection with the formation of a co-investment vehicle for a transaction with the Debtors. The last time billed to the representation was in 2015. I do not believe that Kirkland's current or prior representations of Vine preclude Kirkland from meeting the standard under section 327(e) of the Bankruptcy Code.

8. The spouse of Amanda Whitlow, a Kirkland associate director of lateral legal recruiting, is a senior director of Accordion Partners, LLC ("Accordion"). The Debtors retained Accordion to provide the Debtors with a Chief Restructuring Officer and other supporting

² As referenced in Schedule 1, the term "current" means an entity listed as a client in Kirkland's conflicts search system to whom time was posted in the 12 months preceding the Petition Date. As referenced in Schedule 1, the term "former" means any entity listed as a client in Kirkland's conflicts search system to whom time was posted between 12 and 36 months preceding the Petition Date. As referenced in Schedule 1, the term "closed" means an entity listed as a client in Kirkland's conflicts search system to whom time was posted in the 36 months preceding the Petition Date, but for which the client representation has been closed. Whether an actual client relationship exists can only be determined by reference to the documents governing Kirkland's representation rather than its potential listing in Kirkland's conflicts search system. The list generated from Kirkland's conflicts search system is over-inclusive. As a general matter, Kirkland discloses connections with "former" or "closed" clients for whom time was posted in the last 36 months but does not disclose connections if time was billed more than 36 months before the Petition Date

personnel, and to provide financial advisory services.³ Out of an abundance of caution, Kirkland has instituted formal screening measures to screen Ms. Whitlow from all aspects of Kirkland's representation of the Debtors.

9. Kirkland will continue to review its files periodically during the pendency of these chapter 11 cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Kirkland will use reasonable efforts to identify such further developments and will promptly file an additional supplemental declaration, as required by Bankruptcy Rule 2014(a).

³ See Order (I) Authorizing the Debtors to Retain Accordion Partners, LLC, (II) Designating Keith Maib as Chief Restructuring Officer, Effective as of the Petition Date, and (III) Granting Related Relief[Docket No. 209].

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 29, 2025

Respectfully submitted,

/s/ Chad J. Husnick

Chad J. Husnick
as President of Chad J. Husnick, P.C., as Partner of
Kirkland & Ellis LLP; and as Partner of Kirkland &
Ellis International LLP

SCHEDULE 1

Name of Entity Searched	Name of Entity and/or Affiliate of Entity, that is a K&E Client	Status
City National Bank	William Grayson	Closed
United States, Government of the, Internal Revenue Service	United States Department of Commerce	Current